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CLEARY GOTTLIEB STEEN & HAMILTON LLP

One Liberty Plaza New York, NY 10006-1470 T: +1 212 225 2000 F: +1 212 225 3999

clearygottlieb.com

WASHINGTON, D.C. · PARIS · BRUSSELS · LONDON · MOSCOW FRANKFURT · COLOGNE · ROME · MILAN · HONG KONG BEHING · BUENOS AIRES · SÃO PAULO · ABU DHABI · SEOUL

> D: +1 212-225 2609 vhou@cgsh.com

THOMAS J. MOLONEY
STEVEN M. LOEB
CRAIG B. BROD
NICOLAS GRABAR
HOWARD S. ZELBO
DAVID E. BRODSKY
RICHARD J. COOPER
JEFFREY S. LEWIS
PAUL J. SHIM
STEVEN L. WILNER
ANDRES DE LA GRUZ
DAVID C. LOPEZ
MIDCAL COMPER
MICHAEL D. GRUZ
DAVID C. LOPEZ
MIDCAL COMPER
JORGE U. JUANTORENA
MICHAEL D. GRESTENZANG
LEV L. DASSIN
JORGE U. JUANTORENA
MICHAEL D. WEINBERGER
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JANE VANLARE
DAVID H. HERRINGTON
KIMBERLY R. SPOERRI
AARON J. MEYERS
ABRENGEN
ANNAME

ARON M. ZUCKERMAN
RESIDENT PARTNERS

SANDRA M. ROCKS
JUDITH KASSEL
PENELOPE L. CHRISTOPHOROU
BOAZ S. MORAG
MARY E. ALCOCK
HEIDE H. ILGENFRITZ
KATHLEEN M. EMBERGER
AVRAM E. LUFIT
ANDREW WEAVER
HELEN K. GRANNIS
JOHN V. HARRISON
CAROLINE F. HAYDAY
NEIL R. MARKEL
KENNETH S. BLAZEJEWSKI

KATHERINE R. REAVES RAHUL MUKHI ELANA S. BRONSON MANUEL SILVA KYLE A. HARRIS

LINA BENSMAN

RESIDENT COUNSEL

LOUISE M. PARENT

OF COUNSEL

LAURA BAGARELLA

SUSANNA E. PARKER

JONATHAN D.W. GIFFORD

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September 23, 2020

The Honorable Barbara Moses Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 740 New York, NY 10007-1312

MEMO ENDORSED

Re: <u>DoubleLine Capital, LP v. Odebrecht Finance, Ltd.</u>, No. 17-cv-4576-GHW-BCM

Dear Judge Moses:

We represent CNO S.A., Odebrecht Engenharia E Construção S.A. and Odebrecht S.A. - Em Recuperação Judicial (collectively, the "<u>Defendants</u>" and together with the plaintiffs in the above-captioned action (the "<u>Plaintiffs</u>"), the "<u>Parties</u>") in the above-captioned action. Pursuant to paragraph 2.A of this Court's Individual Rules of Practice ("<u>Individual Practices</u>"), we write to respectfully request that the Court adjourn the settlement conference scheduled for October 1, 2020 for approximately three months, to a date in January 2021.

As your Honor knows from the Parties' prior correspondence to the Court, discovery in this matter is in the early stages. The Parties have exchanged requests for production and are currently in the process of identifying responsive documents for review and production. Given the preliminary nature of the factual record in this Matter, and the Parties' ongoing efforts to develop that record, we believe the Court's participation in settlement discussions would be more effective at a later date.¹

We have conferred with Plaintiffs, who consent to this request, and all Parties are available on January 19 or 21, 2021, which we understand from our discussions with your

¹ The Parties have engaged in preliminary settlement discussions and expect to continue those discussions when and as appropriate in the future.

The Honorable Barbara Moses, p. 2

Chambers may be available on the Court's calendar. This is the first request for an adjournment of the settlement conference. This request would not affect any other deadlines set by the Court.

Respectfully submitted,

/s/ Victor L. Hou

Victor L. Hou (vhou@cgsh.com) Luke A. Barefoot (lbarefoot@cgsh.com)

Thomas S. Kessler (tkessler@cgsh.com)

CLEARY GOTTLIEB STEEN & HAMILTON LLP

One Liberty Plaza

New York, New York 10006

T: 212-225-2000 F: 212-225-3999

Attorneys for Defendants CNO S.A., Odebrecht Engenharia E Construção S.A. and Odebrecht S.A. -Em Recuperação Judicial

Cc: All counsel of record (via ECF)

Application GRANTED. The settlement conference currently scheduled for October 1, 2020, at 2:15 p.m. is ADJOURNED to **January 19, 2021, at 2:15 p.m.** The parties' confidential settlement letters, as directed in the Court's December 2, 2019 Order Scheduling Settlement Conference (Dkt. No. 94), shall be submitted no later than January 12, 2021. The other provisions in the December 2, 2019 Order and the Court's Order dated September 22, 2020 (Dkt. No. 117) remain in effect. SO ORDERED.

Barbara Moses, U.S.M.J.

September 24, 2020